IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

GREATER BOSTON LEGAL SERVICES, et al.

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOMELAND SECURITY, et al.

Defendants.

PLAINTIFFS' MOTION TO RESCHEDULE SCHEDULING CONFERENCE

Case No.: 1:21-cv-10083-DJC

Plaintiffs respectfully request that the Court reschedule the Scheduling Conference currently set for May 16, 2022 to a convenient date several days thereafter. John Montgomery of Ropes & Gray has a prior commitment out of the country on May 16, 2022 and will not return to the United States until May 23, 2022. While his attendance at the conference is not essential, it would assist Plaintiffs if Mr. Montgomery could be present. If there is no alternative date convenient for the Court shortly after his return, however, Plaintiffs are content with the current schedule. Plaintiffs have conferred with counsel for the Defendants who has no objection to this request.

Dated: March 9, 2022 Respectfully submitted,

/s/ Adriana Lafaille
Matthew R. Segal (BBO #654489)
Adriana Lafaille (BBO #680210)
Krista Oehlke (BBO #707566)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MASSACHUSETTS, INC.
One Center Plaza, Suite 850

Boston, MA 02108 (617) 482-3170 ALafaille@aclum.org

/s/ John T. Montgomery
John T. Montgomery (BBO #352220)
Amanda L. Pine (BBO #707611)
Thanithia Billings (BBO #699018)
ROPES & GRAY LLP
800 Boylston Street
Boston, MA 02199
(617) 951-7000
John.Montgomery@ropesgray.com

Meghan Gilligan Palermo (admitted pro hac vice)
Deanna Minasi (admitted pro hac vice)
Lauren Bergelson (admitted pro hac vice)
Ricardo Mullings (admitted pro hac vice)
Phillip Kraft (admitted pro hac vice)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036
(212) 596-9000
Meghan.GilliganPalermo@ropesgray.com